

**REMARKS**

Claims 2-15 and 17-21 remain in this application. Applicant respectfully requests reexamination. A Request for Continuing Examination is filed herewith.

Claims 2-15 and 17-21 were rejected under 35 U.S.C. §103(a) as unpatentable over Published Patent Application U.S. 2002/0070875 (*Crumb*). Applicant respectfully traverses.

The *Crumb* disclosure is directed to a handheld remote control unit communicating with a master control unit. As can be seen in Figures 4A and 4B of *Crumb*, the remote control unit is a handheld device that has dedicated control buttons in addition to a small display 26. The dedicated control buttons, as shown in Figures 4A and 4B, are down button 132, up button 130, heat command button 136, light command button 140, status switch 134, and jet switch 138. The functions of these buttons do not change.

As explained in Paragraph 42 of *Crumb*, for example, when a heat command is sent by the remote control to the processor 36, or in Paragraph 43 of *Crumb*, when a status command is sent by the remote control unit 12 to the processor 36, the functions of the master control is selected by pushing a certain dedicated button on the remote control.

*Crumb* does not show, teach or suggest “the main control determining the function of the control buttons of the remote control in relation to the information being displayed on the remote control; whereby the functionality of the control buttons of the remote control is changed with different display signals being sent by the main control.” Nor does *Crumb* show, teach or suggest “the displayed information determining the function of the push buttons on the remote control, the functionality of the push buttons on the remote control being changed with different display signals being sent by the main control.”

This relationship between the main control and remote control of the present invention is highly desirable because it provides the flexibility to change the functionality of the relationship between the remote control and main control by simply changing the functionality of the main control, *i.e.*, its programming. This is clearly not possible in *Crumb* because *Crumb's* system uses fixed functional buttons.

In light of the above amendment and remarks, Applicant believes that all the claims remaining in this application are in condition for allowance, respectfully requests that all the claims be allowed, and this case passed to issue.

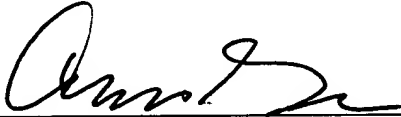
I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to Mail Stop RCE, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on October 4, 2005.

By: Margaret Hasson  
  
Signature

Dated: October 4, 2005

Very truly yours,

**SNELL & WILMER L.L.P.**

  
Albin H. Gess  
Registration No. 25,726  
600 Anton Boulevard, Suite 1400  
Costa Mesa, California 92626-7689  
Telephone: (714) 427-7020